

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STEVE YOUNG, EZEKIEL YOUNG, ROBERT ROBERT KENNEDY AND STEVEN JOHNSON	:	CIVIL ACTION No. 08-CV-4610
Plaintiffs		
:		
:		
v.	:	HON. ANITA BRODY
:		
ST. JAMES MANAGEMENT, LLC STONEHENGE-WALNUT, LLC and STONEHENGE ADVISORS, LLC, (D.B.A STONEHENGE-WALNUT, LLC)	:	JURY TRIAL DEMANDED
Defendants		
:		

PETITION TO WITHDRAW AS COUNSEL

AND NOW comes your Petitioner, Adrian J. Moody, Esquire and Stacy L. Shields, Esquire and in support of their petition avers:

1. Petitioner is currently counsel of record for Plaintiffs Ezekiel Young and Steve Young having entered their appearance on or about October 10, 2009. in the above captioned matter.
2. Shortly after Counsel received from prior counsel related discovery and took the depositions of necessary witnesses on January 21, 2010.
3. On or about February 4, 2010, there was a Settlement Conference before Magistrate Strawbridge and at that time Counsel learned that Plaintiffs were not willing in Good Faith to resolve their claims.

4. Counsel for the Plaintiffs after in their review of all discovery at that time believed that it was in the best interests of the Plaintiffs resolved their respective claims and Plaintiffs were of the opinion that their respective claims were worth more than the values being requested by the Plaintiffs.
5. The undersigned avers that they can no longer effectively represent Plaintiffs because Plaintiffs Steven Young and Ezekiel Young have withheld information to there counsel that adversely affects their cases and prevents Counsel ethically from going forward in its representation.
6. Plaintiffs Steven Young and Ezekiel Young have indicated that they would not accept any advice from their attorneys as they are going to only do what they want to do.
7. When Petitioners questioned the Plaintiffs about the information they refused to say anything or give an explanation.
8. The undersigned avers that the attorney-client relationship has irrevocably broken down, in that Plaintiffs lack trust in the undersigned and Petitioners can no longer effectively represent Plaintiffs.
9. Plaintiffs have indicated that they will get other Counsel to represent them in this matter.
10. Pursuant to Rule 1.16. (a) (6) a lawyer shall withdraw from the representation of a client if the representation will result in an unreasonable financial burden on the lawyer or has been unreasonably difficult by the client.
11. Petitioner requests your Honorable Court to grant leave to withdraw as counsel on behalf of the Plaintiffs, Steven Young and Ezekiel Young.

WHEREFORE, it is respectfully requested that Petitioner be allowed to withdraw as counsel.

Respectfully submitted

ADRIAN J. MOODY, P.C.

By: /s/ AJM 5493
ADRIAN J. MOODY, Esquire
STACY L. SHIELDS, Esquire
1613 Spruce Street
Philadelphia, PA 19103

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document upon the following persons by e-filing:

Charles Ercole, Esquire
Gianna M. Karapelou, Esquire
Klehr, Harrison, Harvey, Branzburg & Ellers, LLP
Fourth Floor
260 S. Broad Street
Philadelphia, Pa 19102-5003

and the following by United States Certified Mail, Return Receipt Requested and U.S. First Class Mail:

Ezekiel L. Young 7011 Limekiln Pike Philadelphia, PA 19138	Mr. Steve Young 2309 Wilson Avenue Claymont, DE 19703
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On March 1, 2010

/s/ AJM 5493
Adrian J. Moody, Esquire
Stacy L. Shields, Esquire